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RSPA-03-14456-9

Dockets Facility
U.S. Department of Transportation
Room PL-401
400 Seventh Street, SW
Washington, D.C. 20590-0001

RE: (Docket NO. RSPA-03-14456; Notice 1)
Pipeline Safety: Liquefied Natural Gas Facilities: Clarifying and Updating Safety Standards

Williams' system of interstate natural gas pipelines, Williams Gas Pipeline (WGP), delivers approximately 12 percent of the natural gas consumed in the United States. Our pipeline network stretches from Mexico to Canada, serving more than 48 million residential, commercial and industrial natural gas users. Williams' subsidiaries wholly own and operate approximately 14,000 miles of interstate natural gas transmission pipeline, comprised of the Transco and Northwest Pipeline systems, and also own a 50-percent interest in the 581-mile Gulfstream pipeline.

WGP is responding to the Office of Pipeline Safety's request for comments on clarifying and updating safety standards for liquefied Natural Gas Facilities (LNG). WGP's comments and recommendations are enclosed.

Sincerely,

James Mathis

James Mathis
Pipeline Safety
Williams Gas Pipeline

Enclosures

Specific Comments to Proposed Changes

The proposed changes by RSPA are numbered and listed below according to the changes in the Notice of Proposed Rule Making (NPRM). The underlined text indicates the proposed language by RSPA. The strikethrough text indicates RSPA's proposed deletions. WGP's comments are stated under each proposed change.

1. Authority citation continues to read as follows:

Authority: 49 U.S.C. 5103, 60102, 60103, 60111, 60118, and 49 CFR 1.53.

Comments: No comment because no changes are proposed.

2. §193.2005 Applicability.

(a) Standards in this part governing siting, design, installation, or construction of LNG facilities do not apply to LNG facilities existing or under construction before the date such standards take effect under this part. ~~Safety requirements mandating compliance with standard ANSI/NFPA 59A and other changes in this part governing siting, design, construction, equipment, fire protection, operation and maintenance apply to LNG facilities placed in service after March 31, 2000 unless otherwise noted.~~

Comments: WGP believes their needs to be a definition or clarification for the meaning of "standard(s)" as used in §193.2005. It needs to clearly state that as used in §193.2005, "standard" means only 49 CFR 193 code language. We need to clearly understand, as used in §193.2005, a "standard" is not a "standard" referenced in §193, such as NFPA 59A. From wording in the Preamble, the proposed rule could be interpreted to mean that all LNG facilities, those built prior to March 31, 2001 as well as those built after that date, must comply with NFPA 59A with respect to fire protection, operation and maintenance. WGP believes that plants should not be required to comply with NFPA 59A with respect to operation and maintenance at this time. Complying with the operation and maintenance requirements of this document would be overly burdensome and inefficient.

Our second comment regarding the "Applicability Section" is the confusion caused by the cross-referencing in NFPA 59A. For example, the fire protection maintenance sections cross-reference dozens of other NFPA documents. NFPA 59A-chapter 9 cross-references 5 other NFPA standards, which include NFPA 600, NFPA 72, NFPA 1221, NFPA 10, and NFPA 1901. NFPA 600, NFPA 72, NFPA 1221, NFPA 10, and NFPA 1901 cross-reference an additional 10, 13, 23, 21, and 11 NFPA standards, respectfully. Section 11.5.5.1, a "maintenance section", references 16 other standards. Complying with this maze of almost 100 cross-references would create undue confusion an operator attempting to comply with only two chapters of 59A.

Additionally, these referenced NFPA standards were not written specifically for LNG plants, or even the natural gas industry, and are not fully applicable. Some of them would restrict company personnel from installing or working on their own plant's equipment. Certain NFPA standards require licensed and certified personnel to perform

maintenance on equipment that existing plant technicians have maintained since the plants were first built. An example is NFPA 72 (4.3.3 and 10.2.2.5). This would require operators to license company personnel who have historically performed these duties or be forced to contract this work with licensed contractors. Licensing plant personnel to do this work imposes additional constraints on affected companies and limits the number of technicians who could work on the equipment. Having to schedule outside contractors for repairs could cause delays in getting critical fire protection systems back in service. The code is specific about minimizing the time that these systems are out of service. Outside contractors would not be specific to the LNG industry and thus would not be familiar with the various hazards inherent in these plants. They would also not be familiar with the relationships between fire protection systems and plant processes. Many of these protection systems have built in plant process shutdowns. Unfamiliar outside contractors could not only get hurt, but could cause plant shutdowns and/or service interruptions to customers.

3. §193.2017(c) Plans and Procedures. (new paragraph)

(c) Each operator must review and update the plans and procedures required by this part at intervals not exceeding 15 months, but at least once each calendar year.

Comments: WGP agrees and supports annual reviews of LNG facilities policies and procedures.

4. §193.2019(a) Applicability.

(a) Mobile and temporary LNG facilities for peakshaving application, for service maintenance during gas pipeline systems repair/alteration, or for other short term applications need not meet the requirements of this part if the facilities are in compliance with applicable sections of NFPA 59A ~~(1996 edition)~~.

Comments: WGP agrees with this change to the proposed rule.

5. §193.2503 Operating Procedures.

Each operator shall follow one or more manuals of written procedures to provide safety in normal operation and in responding to an abnormal operation that would affect safety. The procedures must include provisions for:

(a) Monitoring components or buildings according to the requirements of §193.2507.
(b) Startup and shutdown, including for initial startup, performance testing to demonstrate that components will operate satisfactory in service.
(c) Recognizing abnormal operating conditions.
(d) Purging and inerting components according to the requirements of §193.2517.
(e) In the case of vaporization, maintaining the vaporization rate, temperature and pressure so that the resultant gas is within limits established for the vaporizer and the

downstream piping.
(f) In the case of liquefaction, maintaining temperatures, pressures, pressure differentials and flow rates, as applicable, within their design limits for:
(1) Boilers;
(2) Turbines and other prime movers;
(3) Pumps, compressors, and expanders;
(4) Purification and regeneration equipment; and
(5) Equipment within cold boxes.
(g) Cooldown of components according to the requirements of §193.2505; and,.
(h) Compliance with §193.2805(b).

Comments: WGP agrees with this change to the proposed rule.

6. §193.2507 Monitoring Operations.

Each component in operation or building determined under §193.2805(a)(2) in which a hazard to persons or property could exist must be monitored to detect fire or any malfunction or flammable fluid which that could cause a hazardous condition. Monitoring must be accomplished by watching or listening from an attended control center for warning alarms, such as gas, temperature, pressure, vacuum, and flow alarms, or by conducting an inspection or test at intervals specified in the operating procedures.

Comments: WGP agrees with this change to the proposed rule.

7. §193.2509(b) Emergency Procedures.

(b) To adequately handle each type of emergency identified under paragraph (a) of this section and each fire emergency identified under §193.2817(a), each operator shall follow one or more manuals of written procedures. The procedures must provide for the following:

Comments: WGP agrees with this change to the proposed rule.

8. §193.2605(b)(2) Maintenance Procedures.

(2) A description of other actions necessary to maintain the LNG plant in accordance with the requirements of this subpart and §193.2805.

Comments: WGP agrees with this change to the proposed rule.

9. §193.2705(b) Construction, installation, inspection, and testing.

(b) Each operator must periodically determine whether inspectors performing duties under §193.2307 construction, installation, and testing duties required by this part are

satisfactorily performing their assigned functions.

Comments: WGP agrees with this change to the proposed rule

10. §193.2717 Training: fire protection.

(a) All personnel involved in maintenance and operations of an LNG plant, including their immediate supervisors, must be trained in accordance with a written plan of initial instruction, including plant fire drills, to:
(1) Know and follow the fire prevention procedures under §193.2805(b);
(~~2~~1) Know the potential causes and areas of fire ~~determined under §193.2805(a)~~;
(~~3~~2) Know the types, sizes, and predictable consequences of fire; ~~determined under §193.2817(a);~~ and,
(4) Know and be able to perform their assigned fire control duties according to the procedures established under §193.2509 and by proper use of equipment provided under §193.~~2817~~2801.
(b) A written plan of continuing instruction, including plant fire drills, must be conducted at intervals of not more than 2 years to keep personnel current on the knowledge and skills they gained in the instruction under paragraph (a) of this section.
(c) Plant fire drills must include –
Evacuation of buildings; and
Personnel performing fire control duties.

Comments: Under the proposed rule, Research and Special Programs Administration (RSPA), would like to insure that proper fire drills are being conducted and are proposing to amend 193.2717. The amendment would revise paragraph (a) and add paragraph (c) to read as follows. Plant fire drills must include- (1) Evacuation of buildings and (2) Personnel performing fire control duties. WGP finds this amendment unclear. One interpretation could mean fire personnel need to perform actual fire control duties (actually putting out a fire) or the proposed rule could mean fire personnel have to attend fire drills.

Operators currently go through extensive internal and external fire training. Many operators perform tabletop fire drills as part of the internal fire training process. These drills have proven to be very effective and are designed by the operator to meet the design of the facility. Operators also utilize outside resources. Many local and state fire departments, agencies, and universities have developed onsite fire training and classroom courses for providing a hands-on education approach (actually fighting a fire) for fire departments, natural gas, and LNG facilities. These onsite training facilities have the resources and are designed specifically to safely train fire fighters than would a company's LNG facility. Requiring every LNG plant to have these types of training facilities, that include foam, water, and dry chemicals would require an operator to have additional resources for conducting fire drills.

Operators should determine what actions and equipment must be used during a fire drill. Each LNG facility is substantially different from one another and each operator should be required to determine compliance with this part of the proposed rule.

11. §193.2717 Section II E of Appendix A

1. ANSI/NFPA 59A "Standard for the Production, Storage, and Handling of Liquefied Natural Gas (LNG)" (~~1996~~ 2001 edition).

Comments: WGP agrees with this change to the proposed rule.

Additional Comments

Date of Compliance:
The proposed rule did not specify when LNG operators must comply with the final rule. WGP believes operators should be granted one year from the effective date to comply with this rule.

Code Changes:
Although not currently part of this rulemaking, WGP would like to comment on several parts of CFR 193 concerning testing and inspecting equipment frequencies.

WGP would like the code to read under section §193.2613: Each auxiliary power source must be tested once each calendar month to check its operational capability and tested for capacity once each calendar year but with intervals not exceeding 15 months. The capacity test must take into account the power needed to start up and simultaneously operated equipment that would have to be served by that power source in an emergency.

Under section §193.2619 (c) (2), WGP would like the code to read: Control systems that are intended for fire protection must be inspected and tested at regular 6 months intervals not exceeding 7 and1/2 months, but at least 2 times per calendar year.

Manuals incorporated by reference in the CFR Part 193:

Although not currently part of this rule making, WGP recommends section §193.2013 (a) be updated. Currently this section references 1975 edition of the American Gas Association (AGA), Purging Principles and Practices. WGP would like the code to reflect the latest 2001 edition published by AGA.

Conclusion

WGP is very experienced operator of three LNG facilities in the United States. These facilities, Pine Needle LNG Facility in Stokesdale, NC, Northwest Plymouth LNG in Plymouth, WA and Transco Station 240 in Carlstadt, NJ are among the safest in the LNG industry and have storage capacity of 2 Bcf., 4 Bcf., and 2.4 Bcf, respectively. WGP appreciates the interest of RSPA in the LNG safety and the opportunity to comment on this proposed rule